

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

FAUSTINO XAVIER  
BETANCOURT COLÓN

Plaintiff

CIVIL NO.

3:23-cv-01338-ADC

v.

PLAZA LAS AMERICAS, INC.,  
PUERTO RICO TELEPHONE  
INC, FAST FASHION GROUP  
INC, ADISPORT CORPORATION,  
ZARA PUERTO RICO, INC, AFH  
PUERTO RICO LLC, MAGRITTE  
CHOCOLATIER INC, ORIENTAL  
BANK

Defendants

**MOTION TO DISMISS WITH PREJUDICE**

**TO THE HONORABLE COURT:**

**COMES NOW** Plaintiff, Faustino Betancourt Colón, through the undersigned attorney, and hereby informs:

1. Pursuant to Fed. R. of Civ. P. 41(a), the Plaintiff moves to voluntary dismiss the instant Complaint as to Co-defendant Zara Puerto Rico Inc., **WITH PREJUDICE**.

**WHEREFORE**, This Honorable Court is respectfully requested to grant the Plaintiff's motion for the dismissal of the current complaint.

**I HEREBY CERTIFY**, that on this date we have electronically filed copy of the foregoing with the Clerk of the Court using the CM/ECF system, which will notify all attorneys of record.

**RESPECTFULLY SUBMITTED.**

Dated: January 2<sup>nd</sup>, 2024.

**VELEZ LAW GROUP LLC**  
Civil Rights Division

s/José Carlos Vélez Colón  
José Carlos Vélez Colón  
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**PLAINTIFF'S ATTORNEY**